

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America
v.Demario M. ROBINSON
(DOB: xx/xx/2002)

Case No. 23 MJ 170

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2022 - August 2023 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 922(g)(1) & 924(a)(8);
18 U.S.C. § 922(o)(3) & 924(a)(2);Count 1: Possession of a firearm by a felon;
Count 2: Possess a machinegun;

21 U.S.C. § 841; and

Count 3: Possession with intent to distribute marijuana; and

18 U.S.C. § 545

Counts 4 - 6: Smuggling goods into the United States, that is knowingly
bought, received or facilitated the transportation of machine gun conversion
devices, knowing they had been unlawfully imported into the United States.

This criminal complaint is based on these facts:

This complaint is based on these facts:
See Attached Affidavit.☒ Continued on the attached sheet.

Complainant's signature

Nesrodene Ghassoul, FBI TFO

Printed name and titleSworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 11/1/2023

Judge's signatureCity and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nesrodene Ghassoul, being first duly sworn, hereby depose and state as follows:

SUMMARY

1. Demario ROBINSON (ROBINSON) illegally imported from China hundreds of “switches”—parts used to convert semi- automatic weapons into machineguns—over the course of a year, which he then sold either individually or after he attached them to a firearm. These sales occurred in Milwaukee and Chicago, Illinois.

2. These switches, more properly called “machinegun conversion devices” (hereinafter “MCDs”) have flooded the United States in recent years and are used solely “to convert an already dangerous firearm into an extremely dangerous machinegun.” *United States v. Hixson*, 624 F.Supp.3d 930, 939 (2022).

3. When police arrested ROBINSON on June 20, 2023, they located both a Glock 19 9mm handgun with an attached MCD and an extended magazine (thrown out his apartment bedroom window) as well as an MCD designed for a rifle that was found hidden in his bedroom. ROBINSON was previously convicted of a state felony offense on June 1, 2023, making his mere possession of the firearm a federal crime even without the MCD attached.

4. In the summer of 2023, U.S. Customs intercepted two of ROBINSON’s final packages he ordered from China, containing a total of 57 MCDs, disguised to avoid detection. Records including ROBINSON’s phone extraction, bank records and shipping records combined with his *Mirandized* admissions demonstrate the scope of this import scheme—ROBINSON made at least a dozen orders of MCD from China in the 14 months between June

2022 and August 2023 which he then distributed with and through a network of associates who located buyers for him.

AFFIANT BACKGROUND AND EXPERIENCE

5. I am a Police Officer with the City of Milwaukee Police Department and have been since July 2015. As of December 2019, I've been assigned and attached as a Federally Deputized Task Force Officer (TFO) with the Federal Bureau of Investigation's (FBI) Milwaukee Area Safe Streets Task Force (MASSTF). I am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. Section 2510(7), in that I am empowered by the law to conduct investigations of and to make arrests for federal felony arrests.

6. I have participated in the investigation of firearms and narcotics-related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, and weapons, including MCD (switches). As a firearms investigator, I have interviewed many individuals involved in firearm and drug trafficking and have obtained information from them regarding acquisition, sale, importation, manufacture, and distribution of firearms and controlled substances. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled substances as well as those trafficking in firearms and MCD.

7. Based on my training and experience, I have become familiar with the language utilized to discuss firearms and drug trafficking and know that the language is often limited, guarded, and coded. I also know that firearms and drug traffickers often use electronic devices (such as computers and cellular phones) and social media to facilitate these crimes.

Based on my experience, I know that firearms traffickers may keep photographs of these items on electronic devices.

8. I also know that drug traffickers and firearms traffickers commonly possess—on their person, at their residences, at their places of business, in their vehicles, and other locations where they exercise dominion and control—firearms, ammunition, and records or receipts pertaining to such.

9. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all my knowledge about this matter.

10. Based upon the evidence gathered to date, I submit that there is probable cause to believe that Demario M. ROBINSON has committed violations of federal law, including Title 18, United States Code, Sections 922(g)(1) and 924(a)(8) (possession of a firearm by a felon), Title 18, United States Code, Sections 922(o)(3) and 924(a)(2) (knowingly possess a machinegun), Title 21 United States Code, Section 841 (possession with intent to distribute marijuana) and three counts of Title 18, United States Code, Section 545 (smuggling goods into the United States). Specifically, I believe there is probable cause to believe that ROBINSON bought, received or in any manner facilitated the transportation of merchandise (MCDs) which had been imported into the United States contrary to law and that he knew the MCDs had been imported into the United States contrary to law in that they were not registered and thus illegal to possess.

PROBABLE CAUSE

11. This case involves an investigation into trafficking and sales of MCDs, a device I am familiar with and can identify based on my training and experience. I know that full MCDs, also known as “switches” or “buttons”, convert a firearm to firing in fully automatic mode. MCDs are commonly and illegally traded and sold by those committing crimes in the Milwaukee area and are often also found attached to handguns associated with criminal activity.

12. MCDs are illegal to possess under federal law, irrespective of the possessor’s previous criminal record, unless manufactured prior to May 1986, or possessed by a properly licensed Federal Firearms licensee who paid the appropriate Special Occupational Tax. Given the circumstances set forth in this affidavit, I do not believe the MCDs described below, and others part of this investigation were manufactured prior to 1986, as the Glock MCDs involved in this investigation were recently manufactured and not available prior to 1986. Further, given that the defendant Demario ROBINSON, has a prior felony conviction and other circumstances set forth in this affidavit, I do not believe ROBINSON possesses a federal firearms license. Based on my training and experience, a felon is ineligible to obtain such a license.

13. On June 16, 2023, I obtained a federal search warrant authorizing a search of ROBINSON’s residence located at 6537 N Beale St #5, Milwaukee, and on June 20, 2023, at approximately 9:13 AM, members of the Milwaukee County Sheriff’s Department (MCSO) SWAT and I executed that warrant. While MCSO was attempting to make entry into the residence, law enforcement observed a black firearm discarded from a window later determined to be ROBINSON’s bedroom located within ROBINSON’s residence. ROBINSON, along with

Adult Male 1, was located within the residence and placed in custody. Additionally, ROBINSON's girlfriend (Adult Female 1) and a small child were also located within the residence and temporarily detained.

Count 1: Felon in Possession of a Firearm

14. Based on the foregoing, I believe that ROBINSON possessed the firearm discarded from his bedroom window, more fully described as a black, Glock 19 Gen 5 9x19 handgun with extended magazine and an MCD attached, allowing the handgun to be operated as a fully automatic machine gun. The firearm was loaded with 31 cartridges in the magazine and one cartridge in the chamber.

15. ROBINSON'S Instagram account was obtained via federal search warrant, and in it I observed a conversation from June 15, 2023 (five days prior to the search warrant's execution) in which ROBINSON stated: "I only got my Glock I sold hellcat."

16. Further, data downloaded from ROBINSON'S phone showed that on June 20, 2023, ROBINSON made a variety of Glock related Google searches for terms such as "glock night sights", "glock 19 compesator", and "can a glock 19 barrel fit a glock 26".

17. DNA Analyst Emily O. Schmitt, of the Wisconsin State Crime Lab, compared a mixture of DNA found in swabs from the grip of the recovered Glock 19 to the DNA developed from ROBINSON's buccal swab. Analyst Schmitt concluded that the mixture was at least 1 quadrillion times more likely to include ROBINSON's DNA than that of an unknown person.

18. On June 21, 2023, law enforcement conducted a *Mirandized* in custody interview of ROBINSON. During the interview, ROBINSON admitted that his fingerprint would

be somewhere on the slide towards the end of the barrel of the Glock seized from his residence during the search warrant. ROBINSON also admitted that he installs switches on firearms for profit but claimed that he is provided the switch from another unidentified individual. Regarding the seized package of machinegun conversion devices, ROBINSON stated he allowed an unidentified individual to send packages to ROBINSON's residence on at least three previous occasions. ROBINSON claimed that initially he didn't know they contained switches but learned they did when the unidentified individual asked if ROBINSON could install one for another individual.

19. ROBINSON had previously been convicted of a felony, that being Possession of THC with Intent to Distribute with the enhancer of Use of a Dangerous Weapon, on June 1, 2023, in Waukesha County, Wisconsin, case number 2022CF000288.

Count 2: Illegal Possession of a Machine Gun (2 weapons)

20. The above-mentioned Glock was also tested by Jessica C. Crawford of the Wisconsin State Crime Lab. She noted that it was mechanically functional and equipped with an aftermarket slide cover plate with a built-in MCD/auto sear and cross-bolt selector switch. This modification allowed it to fire more than one shot with a single pull of the trigger (full auto) regardless of the position of the cross-bolt selector switch.

21. I concluded that the above-mentioned bedroom was used by ROBINSON because it was filled with male clothing and contained many documents with his name and address.

22. Within ROBINSON's bedroom, I know that a fully automatic MCD for a rifle was found within a Cartier glasses container on a shelf underneath the window. Based on

my training and experience, I recognized this rifle MCD if attached would allow a rifle to fire in automatic mode, and thus the MCD is illegal to possess.

Count 3: Possession with Intent to Distribute Marijuana

23. I know that upon executing the above search warrant on ROBINSON's residence, law enforcement seized the following items: (a) a clear plastic sandwich bag containing 320 grams of marijuana, which tested positive for THC was found in the kitchen; (b) a clear plastic baggies containing 26 grams of marijuana was found in a bathroom closet; (c) a black pound size bag containing 127 grams of marijuana was found in ROBINSONS's bedroom and (d) 7.6 grams of apparent methamphetamine located in ROBINSON's bedroom closet.

24. I concluded each bag mentioned above contained marijuana based upon my training and experience in the identification and detection of controlled substances and marijuana, and because field tests were conducted on each bag, with each bag testing positive for the presence of tetrahydrocannabinols (THC).

25. I am aware that Officer Ryan Reagan conducted surveillance at the defendant's residence on June 14, 2023, prior to the execution of the search warrant and observed the defendant leave the apartment with a gallon-sized bag of a green, leafy substance he believed to marijuana and a black handgun with an extended clip.

26. I and Officer Reagan conducted a *Mirandized* interview of ROBINSON, in which he confirmed the gallon size bag he left with on June 14 was marijuana and that he had not returned with it. ROBINSON also claimed he didn't really sell marijuana but admitted he had ended up with a pound of marijuana after trading a gun to someone for it. ROBINSON also

described needing a weapon because of a prior incident in 2020 where he was attempting to sell someone marijuana but ended up shooting at the person after they attempted to rob him.

27. In my opinion, based upon my training and experience and due to the amounts and packaging as well as the full context of the case, I believe the marijuana described above was possessed with an intention to distribute.

Count 4: Smuggling 47 MCDs on 5/31/23 (SHIPMENT #1)

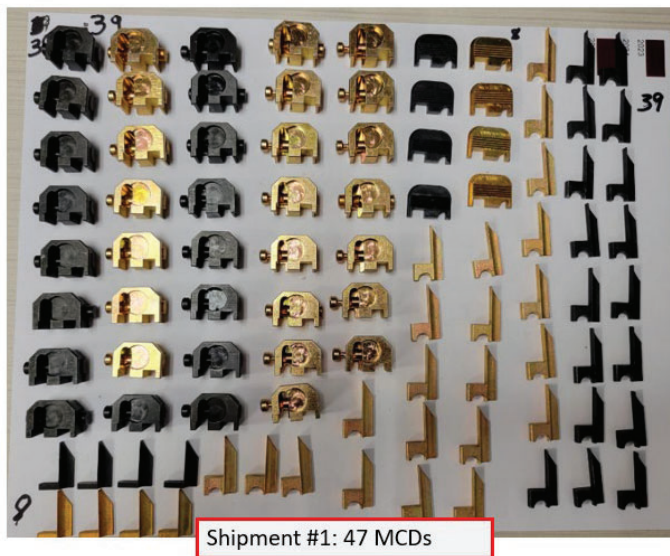
28. On May 31, 2023, at the FedEx Hub in Memphis, TN, FedEx officials selected an inbound package (Shipment #1) from China (with the tracking number of XXXX-XXXX- 5885) for an intensive exam by the U.S. Customs and Border Protection (CBP).

29. On June 7, 2023, Shipment #1 arrived from China and was taken to the CBP exam area to be searched. The package originated from Yunxuan (Xiamen) Import and Export, F4-3, #29 Tianyang Rdjumei CN 361021 and was addressed to Mar Marvell, 6537 N Beale St Apt 5, Milwaukee Wisconsin. During the search, CBP found that Shipment #1 contained dozens of MCDs that are used for full-auto conversion of a handgun and thus in violation of federal law. The MCDs were concealed within a bag of screws. As further described below, I believe ROBINSON ordered Shipment#1 and intended for it to be transported to his residence (6537 N. Beale St. Apt 5) in Milwaukee. The importation of such MCDs is restricted by the Bureau of Alcohol, Tobacco, Firearms and Explosives. Further, I know that many of the MCDs recovered in the United States are supplied by companies in China, where manufacturers list the devices on online marketplaces and sell directly to consumers.

30. I know that the warrantless search of this parcel was conducted by U.S. Customs and Border Protection under the Border Search Authority found within 19 U.S.C 1582

and other provisions. A CBP officer's border search authority is derived from federal statutes and regulations, including 19 C.F.R. 145.2(b) which states that "all mail originating outside the Customs territory of the United States which is to be delivered within the Customs territory of the United States...is subject to Customs examination" with no suspicion requirement.

31. On June 13, 2023, I received the contents of Shipment#1 which had been intercepted by CBP and later confirmed it contained 47 items that I recognized from my training and experience as MCD/ auto sears/switches, which are thus illegal for ROBINSON to possess under



federal law. I also observed the box they were contained within had the return address of Yunxuan (Xiamen) Import and Export, F4-3, #29Tianyang Rdjumei CN 361021 and was addressed to Mar Marvell, 6537 N. Beale St #5 Milwaukee WI at the phone number XXX XXX-5689. I know that ROBINSON'S middle name is Marvel which adds to my belief that the package was ordered by and intended to be possessed by ROBINSON.

32. On May 12, 2023, a case agent conducted a utility check for 6537 N Beale St #5, Milwaukee, Wisconsin. The utilities are registered to Adult Female 2, who is known to be Demario ROBINSON's mother based on law enforcement records.

33. I am also aware that TFO Joseph Esqueda recovered an iPhone from ROBINSON's possession during the warrant execution on June 20, 2023. That phone was later searched and forensically downloaded, pursuant to a judicial warrant. The data recovered from

the phone confirmed that it belonged to ROBINSON because it was logged into two iCloud accounts using emails based on his name and because it contained many pictures of him.

34. The phone download also showed the phone to be using XXX XXX-5689. A reverse phone lookup for that number had previously been completed, which revealed that number listed to Demario ROBINSON.

35. The download included an ongoing stream of contacts between Robinson and Conspirator 1 regarding MCD importation, beginning at least by September 1, 2022. ROBINSON habitually screenshot on his cell phone many (but not all) of these conversations.

36. Three of those screenshot conversations are relevant to Shipment 1. On April 30, 2023, ROBINSON and Conspirator 1 discuss pricing and agree on a rate of 50 MCD for \$1,000. In the same conversation, Conspirator 1 describes how the shipment will come in two different packages with two different shippers. In a May 11, 2023, screenshot, ROBINSON states “Sorry I’ll just order the 50 sets for \$1000”. He also screenshots a *draft* response specifying his order: “25 Gold 15 black, 5 invisible gold, 5 AR style”. (50 total). I know from my training and experience that “invisible” in this context means that the MCD simply converts the weapon to always fire full auto, with no “switch” on the back of the weapon to change that setting. This type of MCD includes a standard backplate on the firearm as opposed to a large housing device—thus, the conversion is described as “invisible.” Lastly, on June 12, 2023, there is a discussion of the intercepted switches, in which Conspirator 1 told the defendant:

“My friend, we think the package is stuck and it is almost impossible to continue delivery... My boss’s plan is to reissue 16 sets of products each time in your next 3 orders to compensate for your losses. We will use different packaging methods to make the shipment as smooth as possible.”

ROBINSON responded:

“I can’t do that I paid y’all for my order... **I paid yall \$1000 usd** I shouldn’t have to pay nomore money for something I did not receive y’all are trying to scam.”

37. ROBINSON also texted other individuals, connecting the intercepted FedEx shipment with an order he had placed. On June 6, 2023, he texted “Bobo” at XXXXXX -5072:

“Fed ex Package still in same spot the other one from dhl came today. So I got the chop ones right now & the other should come tomorrow”

38. That text to “Bobo” is corroborated by the shipping company details—the intercepted Shipment#1 was sent via FedEx, and separate text messages in ROBINSON’s phone from DHL Express indicate that a package “4568271901 from Parcel from HK” (Hong Kong) was delivered June 5, 2023.

39. I believe this order corresponds with Shipment#1 as the package contained a mix of black, gold and “invisible” MCD parts, consistent with ROBINSON’s drafted order for 50. The above-mentioned screenshot draft order was for those types as well as “Ar style” which is consistent with his texted description of “chop ones” that arrived June 5, 2023. Moreover, this also links back to Conspirator 1’s initial description that a single order would arrive in multiple shipments via different carriers.

40. Finally, records from Western Union obtained via subpoena further corroborated this transaction, revealing a payment of \$1000 sent May 30, 2023, to “[a name that includes Coconspirator 1’s last name” by ROBINSON. This is the day before Shipment#1 is sent.

Count 5: Smuggling 10 MCDs shipped 6/20/23 (Shipment #2)

41. I know that FedEx officials intercepted a second shipment (Shipment#2) at the FedEx Hub in Memphis, TN, under the shipping number # 7800 9292 5771 manifested as “OTHER ZINC PRODUCTS”. I know that on August 15, 2023, the shipment arrived in the CBP exam area. An intrusive exam revealed multiple MCDs that were concealed within a metal puzzle. The items were undeclared, mis-manifested, and lacked any ATF importation approvals. The items were seized.

42. Subsequently, I received the above-described Shipment #2 intercepted by CBP and confirmed it contained 10 items that I recognized from my training and experience as MCDs/auto sears/switches and is thus illegal for ROBINSON to possess under federal law. I also observed the box they were contained within had the return address of Ki Ki Su, Xiamen JTY No. 868-103 Linhoushe Heshan St Xiamen, CN 361006. Phone: xxx-xxx-1031.

43. I know that Shipment#2 (See photos of packing and contents below) was addressed to ROBINSON’s girlfriend, Adult Female 1 using her middle name, at the residence they shared located at XXXX N. 37th Street. Shipment#2 also included ROBINSON’S phone number of XXXXXX-5689. Shipment 2 was shipped via FedEx express on June 20, 2023. That same day, ROBINSON received notification on his phone that “Tongtong” had picked up his Western Union Money Transfer. A Western Union subpoena revealed that a wire transfer associated with ROBINSON had been sent in the amount of \$240 and paid on June 19, 2023—the day prior to shipment.

44. After taking possession of Shipment#2, I observed that the 10 MCDs had been concealed within a puzzle box for the apparent purpose of evading detection by



CBP. I listened to a recorded call placed by ROBINSON from jail on June 22, 2023, in which he discussed this shipment with Adult Male 3. In that call, Adult Male 3 stated “If you talking about what sis just told me the other day that another one going to her house” and ROBINSON responded “Yup, Adult Female 1’s shit.” and later “I fucked up, I admitted to some shit bro, but it wasn’t, it wasn’t, it ain’t nothing to whats its name, but oh my god, how that shit was coming, they knew.

Count 6: Smuggling on at least 8 specific dates from 5/31/22-6/6/23

Overview

45. I know that ROBINSON’s cell phone had an installed “app” for the Alibaba website. Alibaba is an online shopping website similar to Amazon. Because it is based on Chinese merchandise, I know it is a common source for MCDs. In a series of messages sent on September 8, 2022, to XXX-XXX-6942, ROBINSON sends a link to a sales page at Alibaba.com, directing: “Yu can download the app”. ROBINSON sends a photo and states “That’s what’s it called lmk [let me know] before yu order some so I can let you know if it’s the right seller.” ROBINSON states: “Tell them you usually get 24 sets for \$500 try to get back of him he only do 20 sets for \$500.”

46. ROBINSON warns 6942, and in doing so explains why the website is so valuable: “Don’t give nobody the site cuz unless it’s fam in atl don’t give nobody down here in Milwaukee the site.” 6942 replies, after a description of the type of MCDs available on the website: ‘Cuz nobody getting that shit not even my cousin I’m Finna be the only n***** wit these bitches.’”

47. On September 1, 2022, ROBINSON also took a screenshot of the “Messenger” page within the Alibaba App. That screenshot has tabs across the top for “Orders”, “Promotions” and “Other”, as well as buttons tabs including “Messenger” and “Cart.” In the screenshot, it appears that ROBINSON had placed 16 orders prior to the date of the photo. It also appears he had 61 items in his “cart” at the time the photo was taken.

48. In that screenshot, a message from Conspirator 1 is visible, that states “I will send you 21 sets in total”. However, there are also visible communications with five other similar businesses—all of which appear to be offering various types of MCDs for sale on Alibaba. Several of the names or business names appear elsewhere in the phone download in ways suggesting that ROBINSON was actively purchasing switches from a variety of sources on the Alibaba website.

49. For instance, one of the other messages is to “lucky S”. Elsewhere in Robinson’s phone, I observed a video where he scrolled through a conversation with that account, from July 26, 2022. In that conversation, ROBINSON requests a particular model, saying “I want the old model that’s what my people want” and “I get the new model from other sellers for way cheaper.” ROBINSON asked for and

received the above picture, which I recognize to depict an MCD. ROBINSON also sent a receipt picture showing a \$500 order and eventually quarrels about the lack of a shipment tracking number.



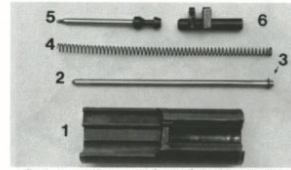
50. The data downloaded from ROBINSON's phone reveals that on July 20, 2022, he visited a news website story: <https://www.foxla.com/news/black-market-guns-over-200-mislabeled-packages-containing-illegal-full-auto-glock-conversion-switches-recovered-at-lax.amp>. This news story included accurate information about the illegality of MCDs, and how the ATF was actively attempting to stop their importation from China.

51. On May 25, 2023, ROBINSON took a screenshot of a manuel on converting semi-automatic weapons to fully automatic. This manuel begins with the warning "The conversion procecdure outlined in this chapter falls under federal regulations regarding machineguns, and the completed bolt necessary to facilitate full auto functioning in any



The KG-99 SMG field-stripped into its major components.

1. Upper receiver assembly with optional vertical foregrip.
2. Lower receiver assembly
3. Full-auto bolt assembly
4. Bolt handle
5. Assembly pin



Semi-auto parts removed for the full auto conversion:

1. Bolt
2. Striker Spring Guide
3. E-Ring
4. Striker Spring
5. Firing Pin
6. Striker

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3

Conversion Procedure

The conversion procedure outlined in this chapter falls under federal regulations regarding machineguns, and the completed bolt necessary to facilitate full auto functioning in any of the weapons previously mentioned is considered a machinegun itself by definition, irregardless of the presence of a firearm. The conversion described here requires the manufacture and installation of a new bolt. This bolt is the only component required to produce full auto fire, henceforth the bolt becomes the registered element comprising a "machinegun". DO NOT BEGIN CONSTRUCTION OF THE BOLT UNTIL ATF APPROVAL IS RECEIVED. FAILURE TO DO SO MAY SUBJECT THE BUILDER TO A FINE OF UP TO \$10,000.00 AND/OR INCARCERATION OF UP TO TEN YEARS.

As described in the previous chapter, the fully automatic KG-99, KG-99 MINI, TEC-9, and TEC-9 MINI all operate from the open bolt. The original semi-auto bolt, striker, striker spring, striker spring guide, E-ring, and firing pin are not used and may be saved for spare components if the weapon were to be later converted to semi-auto. (An example being to move to another state in which machineguns are not permitted). The extractor and extractor screw are removed and used with the new bolt. It is advisable to simply order a replacement extractor and

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of the weapons previously mentioned is considered a machinegun itself by defintion, irregardless of the presence of a firearm... DO NOT BEGIN CONSTRUCTION OF THE BOLT UNTIL ATF APPROVAL IS RECEIVED. FAILURE TO DO SO MAY SUBJECT THE BUILDER TO A FINE OF UP TO \$10,000 AND/OR INCARCERATION UP TO TEN YEARS."

52. On May 26, 2023, ROBINSON texted an acquaintance about a police visit to his home, stating "Police ran in my house bro stg I coulda just got knocked w buttons, they got my bitch I ran over balcony." I am familiar with the actual police interaction that this text refers to.

53. I believe that all the information in this complaint, including the manner in which shipments were paid for and packaged, but specifically paragraphs 50, 51 and 52 demonstrate that ROBINSON was aware of that the importation of the MCDs as described in this complaint was contrary to United States law.

54. A text exchange with “Bobo” further demonstrates ROBINSON’s sale of MCDs. In the days leading up to April 21, 2023, ROBINSON and “Bobo” discuss MCD pricing: first ROBINSON offers 5 for \$380, however “Bobo” only has \$250 and is then offered 3. They eventually agree on 4 for \$250. “Bobo” uses cash-app that same day to send \$250 to ROBINSON.

55. A text exchange on June 17, 2023, demonstrates the multi-state scope of ROBINSON’s sales, when he tells XXX-XXX-6524 “I’m in Chicago until Tuesday I’m trynn dump these buttons Down here.” I know that “buttons” are a street term for MCDs.

56. The data downloaded from ROBINSON’s phone also included an undated advertising video apparently made for social media which displayed multiple firearms including several with full auto selector switches and the caption “If yk yk my house.”

June 6, 2023 Shipment

57. As mentioned above, part of the order for Shipment #1 was sent via DHL, was not intercepted, and, according to ROBINSON’s texts, contained rifle MCDs such as the one recovered in the search of his apartment.

58. Besides the text to “Bobo” mentioned above, ROBINSON’s phone download revealed ROBINSON texted at least five different individuals announcing the arrival of these MCDs and attempting to sell them at prices ranging from \$120 to \$200.

59. These texts, the DHL receipt text, and his ‘draft order’ to Conspirator 1 mentioned above, as well as the rifle MCD recovered in his apartment all combine to prove his receipt of smuggled rifle and handgun MCDs on June 6, 2023.

May 22, 2023 Shipment

60. I know that in addition to the two Western Union wire transfers described above which paid for Shipments #1 and #2, business records revealed 3 prior payments from Demario ROBINSON to an individual with the same last name as Conspirator 1. Those payments are as follows: \$600 on May 15, 2023, \$1,000 on April 3, 2023, and \$590 on February 3, 2023.

61. As described above, I know that FedEx data correlated with the Western Union data for both Shipments #1 and #2. More particularly, \$1,000 transferred on May 29th, linked to Shipment #1 sent May 30th and \$290 transferred June 19th corresponded with Shipment #2 sent June 20th.

62. This same pattern holds for a previous un-intercepted package shipped May 18, 2023—sent via FedEx from the same “Xiamen Import and Export Co.” as Shipment#1, which is further described as a 3.5 kg package claimed to contain only “steel screws” sent just days after the May 15, 2023, \$600 wire transfer.

63. Because the conversations with Conspirator 1 repeatedly discuss ladder pricing, and because the intercepted orders confirm that \$290 yields 10 MCDs while \$1,000 bring back 50 MCD’s, I conclude that the \$600 sent May 15, 2023, resulted in 25 MCDs being shipped to ROBINSON on May 18, 2023.

64. This conclusion is corroborated by the labelling: to avoid detection, shipment #1 was labelled as 2,000 screws weighing 4.35 kilograms, the May 18, 2023, shipment was labelled as 1850 screws weighing 3.5 kilograms.

65. I also observed a screenshot of the tracking information for the FedEx May 18th shipment in the data downloaded from ROBINSON's phone.

66. On May 22, 2023, ROBINSON asked someone using cell phone XXX-XXX-6135 to "go see if it's a box downstairs." Later that same day, ROBINSON notifies a regular MCD purchaser at "E New Num", XXX XXX-1469 that switches are "Back around."

April 9, 2023 Shipment

67. I know that on April 3, 2023, a Western Union wire transfer made using ROBINSON's name and telephone number to the same supplier for \$1,000 is followed by an April 4, 2023, visit to the DHL delivery tracker website.

68. That payment corresponds with a series of text messages ROBINSON sent to potential customers announcing the arrival of the MCDs on April 9, 2023, to several separate phone numbers, including at least one where he offered "Buttons in \$180 each type, 160 if yu grab >4."

69. Based upon the \$1,000 April 3rd payment to the same individual who sent Shipment#1 to ROBINSON, and the corresponding texts announcing the arrival of MCDs, I conclude ROBINSON received 50 MCD devices on or about April 9, 2023.

February 9, 2023 Shipment

70. ROBINSON's pattern of a Western Union transfer to the same smuggler, followed approximately one week later by a series of texts to ROBINSON's customers announcing or advertising the arrival of MCDs repeats for a Western Union transfer of \$590

made on February 3, 2023. As with the April shipment, the February payment is followed six days later on February 9, 2023, by a series of texts announcing the shipment's arrival.

71. Specifically, ROBINSON texted Adult Male 4 describing the coming shipment before it arrives on February 9, 2023, and on that date sends the attached photo (found on his cell phone) of the 3 types of MCDs he ordered and received.



72. Also on February 9, 2023, ROBINSON sent the same photo to XXX-XXX-5874 with the announcement "buttons in". ROBINSON sent similar advertising texts to multiple other phone numbers on that date.

73. Because of these texts and the photograph of the MCDs some of them contain, as well as the corresponding February 3, 2023, payment of \$590, I conclude that Demario ROBINSON received 25 MCDs on February 9, 2023.

Recovery Of Other MCDs

74. I am aware that on March 28, 2023, members of the FBI Milwaukee Area Safe Streets Task Force (MAASTF) and other law enforcement agencies conducted a search warrant at XXXX N. 30th Street in Milwaukee and located a Glock 19 handgun equipped with a full auto switch, an Anderson Manufacturing AM-15 pistol rifle with a dual drum magazine, and six (6) additional MCDs as well as identifiers for two individuals including Adult Male 5.

75. Adult Male 5 was arrested in May 2023, when a second warrant was conducted at another residence he was associated with, yielding two additional weapons including a Glock 22 .40 caliber pistol equipped with an MCD. On May 17, 2023, Adult Male 5 waived his *Mirandized* rights and admitted he possessed a firearm within the residence. Additionally, Male 5 acknowledged that the gold sears [matching the full auto sears recovered

from N. 30th Street and equipped on the recovered Glock on March 2023] were the reliable ones. Adult Male 5 stated the sears were obtained from “Rio.” Adult Male 5 later provided the full name of Demario ROBINSON and accurately described ROBINSON’s age, hairstyle, and build.

76. Adult Male 5 stated that he’d be able to purchase 50 switches from ROBINSON for \$85 dollars each.

January 8, 2023 Announcement

77. I know that ROBINSON was in state custody from September 15, 2022, until January 7, 2023. On January 8, 2023, ROBINSON made another series of texts notifying at least three of his customers that “they back in.” Because each of the three contacts he notified (XXX-XXX-9355; XXX-XXX-5019; and Adult male 4) was a contact that he had sustained discussion of MCDs with for months and over the course of multiple deliveries, I conclude that the defendant either received an additional shipment to his home while in custody, or still had stock remaining from the September 14, 2022 shipment discussed below.

September 14, 2022 Shipment

78. I know that ROBINSON’s cellphone included a screenshot of a UPS package tracking page, documenting a delivery on September 14, 2022. That date corresponds with another series of advertising texts telling at least 3 individuals leading up to the delivery that he was getting what he described as “metal switches”, “metal buttons” or “buttons” in on or near that date, followed by him telling XXX XXX-3630 that he had “switches” on September 15, 2022.

79. This combination of announcing texts and the UPS delivery receipt, in light of the other context laid out within this complaint makes me conclude the defendant received a shipment of illegal MCDs on or about September 14, 2022.

August 15, 2022 Shipment

80. Although this complaint has focused on texts announcing new deliveries that were ready for sale, I also observed that ROBINSON's cell phone includes intervening texts describing declining inventories. On August 17, 2022, ROBINSON texted XXX-XXX-9355 that he has *only* 11 MCDs left for sale. Three days later on August 20th, ROBINSON texted XXX-XXX- 0200 he has "only a few left" and offers to sell 3 for \$700. By August 21, 2022, ROBINSON advised another individual that "I ain't selling my last one."

81. I believe this shipment arrived August 15, 2022, according to texts ROBINSON sent to at least separate four phone numbers. Based on these text messages, combined with the other information herein, I conclude that the defendant received a shipment of more than 11 MCDs on August 15, 2022.

July 20, 2022 Shipment

82. A further review of ROBINSON's phone revealed a screenshot pertaining to another UPS tracker website, detailing a package was "Out for delivery" on July 20, 2022, which ROBINSON sent to XXX-XXX-9355. This date is corroborated by a series of subsequent advertising texts to at least four phone numbers, notifying them that "new buttons in."

83. On July 20, 2022, ROBINSON engaged in lengthy text conversation with XXX-XXX-9355, eventually selling 4 MCDs for \$950. In the days leading up to that July 20, 2022, delivery, ROBINSON notified that same 9355 number that "I get more in this Monday or Tuesday gang..." and "if you grab 10 I'll do each for \$200." Based upon these text messages, the "out for delivery" receipt and the entirety of the information in this complaint, I believe that ROBINSON received a shipment of more than 10 MCDs on July 20, 2022.

Statement of Adult Male#6

84. I know that Adult Male #6 was arrested by the Milwaukee Police Department on July 25, 2022, after he was found to possess a Glock Generation 23, 40 Caliber pistol, modified with an MCD to fire fully automatic. I later spoke with Adult Male #6 about, among other things, the source of his MCD, and he informed me that he had purchased a total of approximately 35 MCDs from “Dreds”, during roughly the timeframe of July 4, 2022, through July 25, 2022. Adult Male #6 described Dreds’ age, race, hairstyle and build and then identified ROBINSON in a booking photo as the person he’d been talking about. Adult Male #6 stated that ROBINSON would sell MCDs at \$150 for a Glock switch and \$200 for a rifle switch.

CONCLUSION

85. Based on the foregoing, I believe there is probable cause to believe that Demario M. ROBINSON has committed violations of federal law, including Title 18, United States Code, Sections 922(g)(1) and 924(a)(8) (possession of a firearm by a felon), Title 18, United States Code, Sections 922(o)(3) and 924(a)(2) (knowingly possess a machinegun), Title 21, United States Code, Sections 841 and 846 (possession with intent to distribute marijuana) and three counts of Title 18, United States Code, Section 545 (smuggling goods into the United States).